

4. Client Defendants have instructed the Attorneys that the Attorneys shall not continue any discussion with opposing counsel which could lead to a settlement of this case.

5. Client Defendants have advised the Attorneys that, essentially, a substantial amount of their time involved thus far in preparing this case, such as preparing the Planning Report, was unnecessary and have objected to the Attorneys' billings in this regard.

6. Pursuant to Rule 4-1.16 of the Missouri Rules of Professional Conduct, the continued attorney-client relationship among Attorneys and Client Defendants will result in the following unacceptable and unworkable issues:

- a. The client insists upon taking action that the lawyer considers repugnant or with which the lawyer has a fundamental disagreement (Mo. Rule 4-1.16 (b)(4);
- b. The client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled (Mo. Rule 4-1.16 (b)(5);
- c. The representation will result in an unreasonable financial burden on the Attorneys or has been rendered unreasonably difficult by the client (Mo. Rule 4-1.16 (b)(6).


7. Client Defendants, all controlled by Sai Jitta, have been contacted regarding this motion, meetings have occurred and so far, they have expressed no objection to the Attorneys' withdrawal.

WHEREFORE, Douglas J. Patterson and Property Law Firm, LLC pray for an order of this Court authorizing Property Law Firm, LLC and Douglas J. Patterson to withdraw as counsel for Client Defendants JC Business Group, LLC, Santoshi Properties, LLC and Sai Jitta.

Further, the Attorneys request an order of the Court staying all timeframes and scheduled events pending the Court's consideration and ruling on this Motion and for such other and further orders as the Court deems fair and reasonable under the premises.

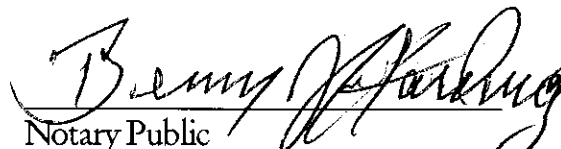
Respectfully submitted,

/s/ Douglas J. Patterson
Douglas J. Patterson, MO # 22991
PROPERTY LAW FIRM, LLC
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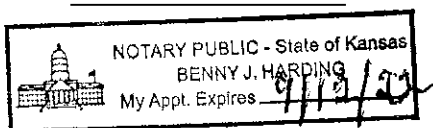

Douglas J. Patterson

STATE OF KANSAS)
COUNTY OF JOHNSON }

Subscribed and sworn to before me, a notary public on this the 12th day of September 2019.


Notary Public

My Commission Expires:



CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent a notification of filing to all counsel of record. In addition, the foregoing document delivered, vis United States mail and email to:

JC Business Group, LLC
Santoshi Properties, LLC
Sai Jitta
14616 Nieman Road
Overland Park, KS 66221
ddinjc@live.com

/s/ Douglas J. Patterson
Douglas J. Patterson